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August 3, 2020

**VIA ECF**

The Honorable Kimba M. Wood  
U.S. District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

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Re: *Alexis Sklair et al. v. Mike Bloomberg 2020, Inc. and Michael Bloomberg*, No. 20 Civ. 2495 (KMW) (GWG)

Dear Judge Wood:

We represent Defendants Mike Bloomberg 2020, Inc. (the “Campaign”) and Michael Bloomberg in the above-referenced action. We write, in light of paragraph 3.A of the Court’s Individual Practices, which ordinarily requires a pre-motion conference, to inform the Court that earlier today Defendants filed a motion to dismiss, or, in the alternative, to strike the class allegations, pursuant to a motion briefing schedule previously entered in this case.

By way of background, on March 23, 2020, Plaintiffs filed their initial Complaint against the Campaign. *See* Dkt. 1. This case was originally assigned to the Honorable Andrew L. Carter. Pursuant to Judge Carter’s Individual Practices, the Campaign filed a letter motion requesting a pre-motion conference regarding its anticipated motion to dismiss or strike on May 1, 2020. *See* Dkt. 15. On May 4, 2020, this case was reassigned to the Honorable Laura Taylor Swain after it was accepted as related to a separate action against the Campaign entitled *Donna Wood et al. v. Mike Bloomberg 2020, Inc.*, No. 20 Civ. 2489.

Pursuant to Judge Swain’s Individual Practices, the Campaign used its best efforts to resolve informally the matters raised in its anticipated motion to dismiss or strike through a meet and confer process that involved an exchange of letters outlining the factual and legal grounds for the anticipated motion and a telephone conference with Plaintiffs. *See* Dkt. 20. After those efforts were unsuccessful, the Campaign filed its motion on June 15, 2020. *See* Dkts. 20-23. Rather than file an opposition to the Campaign’s motion, Plaintiffs filed a First Amended Complaint on July 6, 2020, in which they added Mr. Bloomberg individually as a defendant. *See* Dkts. 36, 39.

On July 13, 2020, Judge Swain entered a motion briefing schedule with respect to Defendants’ anticipated motion to dismiss or strike with respect to the First Amended Complaint. *See* Dkt. 43. Under this schedule, Defendants’ motion was due by today, Plaintiffs’ opposition is due by August 31, 2020, and Defendants’ reply is due by September 21, 2020. *Id.*

We thank the Court for its attention to this matter.

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Respectfully submitted,

*/s/ Elise M. Bloom*

Elise M. Bloom

cc: All Counsel of Record (via ECF)